

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|------------|---|-------------------|
| In re: |) | |
| KARA FAUSS |) | CASE NO. 17-41812 |
| |) | Chapter 13 |
| |) | |
| Debtor. |) | |

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO
DISMISS FOR FAILURE TO TURN OVER TAX RETURNS**

COMES NOW Debtor, by and through undersigned Counsel, and responds to the Trustee's Motion to Dismiss for Failure to Turn Over Tax Returns, stating to the Court as follows:

1. Debtor admits the allegations in Paragraphs 1-7 and Paragraph 9.
2. Debtor is without sufficient knowledge and information to admit or deny the allegation of Paragraph 8, and therefore denies the allegation. Debtor will provide the missing tax returns to the Trustee shortly or will provide an affidavit stating that the Debtor was not required to file income tax returns for the time period requested.

WHEREFORE, Debtor requests the Court to deny the motion to dismiss the case, and such other and further relief as this Court deems just and proper.

Respectfully submitted,

Jason D. Fauss



Jason D. Fauss, #57734MO
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on January 24, 2019 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

A handwritten signature in black ink, appearing to read "Jason Fauss", written over a horizontal line.

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